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August 4, 2008

Ms. Carla Fritz
Cal OSHA Compliance Engineer
Department of Industrial Relations
Northern California Process Safety Management
1450 Enea Circle, Suite 550
Concord, CA 94520

Cal OSHA Document Request Regarding TEL Facility Investigation

Dear Ms. Fritz

Please find attached documents satisfying Cal OSHA's Document Request dated 7/22/2008 (copy attached) related to the complaint of alleged unsafe working conditions at our TEL Unloading Facility. The item numbers correspond to those on your document request. Each document is identified with the corresponding item number.

- 1a. Operating Procedures
 - Two copies of operating procedures have been provided. One is the procedure in place at the time of inspection. The second has been updated to require checking of the safety shower/eyewash facilities prior to each offloading.
- 1b. Consequences of Deviation Table
- 1c. Description of PPE required is included in the operating procedure
- 2a. Hazard Information is provided in the operating procedure (1a), the process description and the MSDSs for:
 - TEL B Aviation Fuel Antiknock Additive
 - Chevron Aviation Gasoline
 - ConocoPhillips Kerosene
- 2b. A brief overview of the TEL plant and Gasoline blending operations is provided

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- 2c. P&IDs and engineering drawings are provided for the TEL unloading rack, piping and hoses.
- 3 PHA documentation
- 4. MOC No. 17470
- 5. Personal and Area Air Monitoring results for TEL and 1,2 Dibromoethane
- 6. Inspection records for the TEL vessel and nozzles
- 7. Respiratory Training and Fit Test records
- 8. Operator training records for MOC No. 17470

For questions, please contact Mr. Mark Robinson at (51) 242-2233.

Sincerely,

T. A. Lizarraga

Attachment

cc: M Robinson M Brennan P Canzius